

# EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

DESHEILA C. HOWLETT,

Plaintiff,

v.

CIVIL NO. 17-11260  
Hon. Terence G. Berg  
Mag. R. Steven Whalen

CITY OF WARREN; COMMISSIONER JERE GREEN, acting in his individual capacity; LT. LAWRENCE GARDNER; SHAWN JOHNSON; DAWN MCLANE; BARBARA BEYER; ANWAR KHAN; DARRIN LABIN; WILLIAM ROSS; KEVIN BARNHILL; PAUL HOUTOS; SCOTT TAYLOR

Defendants.

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Ross, Barnhill, Houtos, and Taylor, only**  
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**PLAINTIFF'S RESPONSES TO DEFENDANTS CITY OF WARREN,  
GREEN, GARDNER, JOHNSON, MCLANE, KHAN, ROSS, BARNHILL,  
HOUTOS, AND TAYLOR'S FIRST SET OF INTERROGATORIES AND  
REQUEST FOR PRODUCTION OF DOCUMENTS**

NOW COMES Plaintiff, Desheila C. Howlett, and provides the following responses to Defendants City of Warren, Green, Gardner, Johnson, McLane, Khan, Ross, Barnhill, Houtos, and Taylor's First Set of Interrogatories and Request for Production of Documents:

**INTERROGATORY**

1. Please state:
  - (a) Your full legal name;
  - (b) Any other names, nicknames, or aliases you have ever used or have been known by, and when you used those names.
  - (c) Your date and place of birth;
  - (d) Your Social Security Number;
  - (e) The number of any valid driver's license you hold, and the State of issuance; and
  - (f) If you are a naturalized citizen, state when and where the naturalization proceedings occurred.

in your response to the previous Interrogatory.

**ANSWER:**

**None in Plaintiff's possession.**

**REQUEST TO PRODUCE**

16. Please produce copies of all documents, records, writings, reports and recordings of every kind and nature evidencing the facts, claims and damages outlined in your complaint.

**ANSWER:**

**See Plaintiff's response to Request to Produce Nos. 14 and 15**

**INTERROGATORY**

14. Identify every effort you have made to mitigate your damages, indicating with specifically each employer with whom you have made application and whether you have been interviewed or offered any position of employment. If you have been offered a position, please state whether you accepted said position, what the position is, and what is your rate of pay.

**ANSWER:**

**Applied for workers comp – Denied**

**Applied for Short Term Disability- Denied**

**Seeing Vocational Rehabilitation Specialist Dr. Ancell**

**Plaintiff is medically unable to work (disabled for another 3 – 6 months) in law enforcement per the advice of Psychologist and state of medical condition. Plaintiff is consulting with a Vocational Rehabilitation Specialist in preparation of pursuing a different career. Plaintiff has not applied for any new employment while under medical treatment**

**REQUEST TO PRODUCE**

17. Produce copies of any other record, writings, documents or recordings which evidence your attempts to mitigate your damages and losses and/or obtain new employment.

**ANSWER:**

**Plaintiff will supplement once same are prepared.**

**REQUEST TO PRODUCE**

18. Please produce copies of your tax records and returns (Fed and State) for each of the previous seven (7) years and execute the attached authorization for the release of your tax records from the State of Michigan Treasury, the Internal Revenue Service, and every other state in which you have filed taxes.

**ANSWER:**

Respectfully submitted,

 9/12/17

Desheila Howlett

Date

**CERTIFICATE OF SERVICE**

I hereby certify that Plaintiff Desheila Howlett's responses to Defendant's First Set of Interrogatories and Requests for Production, all accompanying attachments, and this proof of service were served upon all parties by placing same in the United States Mail to the addresses as disclosed in the pleadings on September 12, 2017.

By: XX U.S. Mail                      FAX                      Electronic Filing

/s/ Francisco Lozano  
Francisco Lozano